UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS ILED OFFICE CIVIL ACTION NO. 04D-10994-NMG 2005 FEB 16 P 3: 12 PARENTS OF DANIELLE, **Plaintiff** U.S. DISTRICT COURT) DISTRICT OF MASS v.) MASS. DEPARTMENT OF EDUCATION, ET AL.,

ASSENTED TO MOTION TO IMPOUND THE RECORD OF THE ADMINISTRATIVE HEARING HELD BEFORE THE MASSACHUSETTS **BUREAU OF SPECIAL APPEALS**

Defendant

NOW COMES the plaintiff in the above-captioned matter, pursuant to MLBR 9018-1 and Webster Grove School Dist. V. Pulitzer Publishing Company 898 F.2nd 1371 (8th Cir. 1990), and moves this Honorable Court to impound the Administrative Record and all exhibits and transcripts in this matter.

As reasons therefor, plaintiff states that impoundment is necessary to protect the confidentiality of the minor student involved in these proceedings.

The plaintiff requests that the material be impounded until further order of the Court.

Respectfully submitted,

PARENTS OF DANIELLE,

By their attorney,

ASSENTED TO:

Tammy Richardson, Esquire

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Amy Spector, Esquire

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Dated: February 9, 2005

CERTIFICATE OF SERVICE

I, Ruth N. Bortzfield, attorney for the plaintiff herein, hereby state that on February 9, 2005, I served a copy of Assented to Motion to Impound the Record of the Administrative Hearing Held Before the Massachusetts Bureau of Special Education Appeals on the defendants by mailing the same, via first class mail, postage prepaid, to the following attorneys:

> Barry L. Mintzer, Esquire Tammy Richardson, Esquire Attorney for Sharon Public Schools Deutsch/Williams 99 Summer Street Boston, MA 02110

Amy Spector, Esquire Attorney for State Defendants Office of Attorney General One Ashburton Place Boston, MA 02108-1598

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